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CENTRALINA COUNCIL OF GOVERNMENTS

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Before the
Federal Communications Commission
Washington, D.C. 20554

MAY 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Replacement of Part 90 by)
Part 88 to Revise the Private)
Land Mobile Radio Services)
and Modify the Policies)
Governing Them)

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PR Docket 92-235
FCC MAIL BRANCH

To: The Commission

Comments of: Centralina Council of Governments Board of
Delegates

Date: May 12, 1993

The Centralina Board of Delegates at its meeting on Wednesday, May 12, 1993 in Lincolnton, North Carolina adopted the resolution attached as official comments pertaining to the aforementioned PR Docket.

The Board of Delegates represents elected officials in fifty-eight (58) municipalities and counties in the south central part of North Carolina. Each of the local governments represented, with very few exceptions, operates a two-way radio system for public safety purposes which will be adversely affected if PR Docket 92-235 is approved as proposed.

Our citizens depend on the law enforcement, fire, and emergency medical services personnel dispatched using communications systems

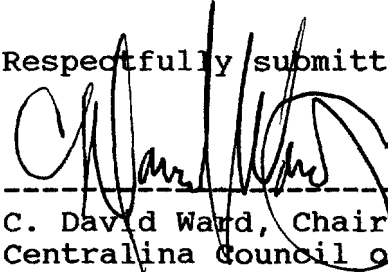
Comments of: Centralina Council of Governments Board of
Delegates
Page: 2

Furthermore, our local governments are in a quandary as to how to address equipment issues between now and January 1, 1996. We have some equipment that desperately needs replacement--but no vendor manufactures equipment which will meet the "second tier" re-farming of 5 and 6.25 kHz. We cannot afford to replace equipment twice in ten years.

Local governments in the United States, and in this region, are faced with a multitude of issues and demands for resources. Many of these demands, such as solid waste management, school construction, and other issues of infrastructure, cannot be left unattended without potential damage to the public's health and safety. The PR Docket 92-235, as proposed, places yet another demand on local governments with no provision for any funding assistance to meet its requirements. And while it addresses communications issues which we all agree need to be addressed, it does so in a precipitous manner not warranted by the conditions of current public safety communications.

While we recognize and support the intent of the proposed docket, we oppose the January 1, 1996 implementation, and encourage the Commission to consider a longer phase-in period. We also encourage the Commission to refrain from adopting rules mandating a technology that does not exist, or at least does not exist in a proven, affordable form. Finally, we recognize that one driver behind the proposal is the need for additional frequencies, and we encourage the Commission to retain frequencies created in the public safety spectrum for public safety use.

Respectfully submitted,



C. David Ward, Chairman
Centralina Council of Governments

cc: Chairmen, Boards of County Commissioners
Mayors in the Centralina Region
City and County Managers

RESOLUTION

IN THE MATTER OF

FCC NOTICE OF PROPOSED RULE-MAKING 92-235

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WHEREAS, local governments and their associated public safety agencies are major users of two-way land mobile radio equipment; and

WHEREAS, public safety agencies deal in the protection of the lives, property, and well-being of the residents of this land, and cannot function without reliable two-way radio communications, therefore becoming priority users of radio frequencies; and

WHEREAS, NPRM Docket 92-235 will result in the creation of additional frequencies and increased efficiency in land mobile radio communications, increasing their reliability in the long term; and

WHEREAS, NPRM Docket 92-235, through its reduction in antenna height and effective radiated power provisions, will require the addition of numerous antenna sites for public safety use to achieve acceptable coverage; and

WHEREAS, virtually none of the UHF or VHF equipment in use in this region is adaptable to the narrower bandwidth requirements proposed by NPRM Docket 92-235 as of January 1, 1996, effectively requiring wholesale replacement of functional radio systems; and

WHEREAS, these changes will result in major local government expenditures in a very short time frame, with no offsetting provisions for grants or cost-sharing; and

WHEREAS, it has been proposed that additional frequencies created by spectrum re-farming be placed in a General Use pool and therefore made available to a wide variety of interests, although there is an urgent need for additional frequencies by public safety interests in many jurisdictions;

NOW THEREFORE, BE IT RESOLVED that the Centralina Council of Governments Board of Delegates goes on record as supporting the intent of NPRM Docket 92-235; and

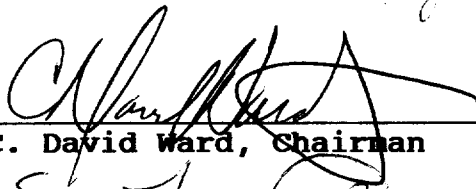
BE IT FURTHER RESOLVED that the Board of Delegates opposes the January 1, 1996 effective date of NPRM Docket 92-235, and recommends instead that a time frame be adopted which permits phasing in of narrow-bandwidth equipment as existing systems age out; and

BE IT FURTHER RESOLVED that the Board of Delegates encourages the Commission to delay adoption of second-tier bandwidth reduction

(i.e., to 5 kHz and 6.25 kHz) rules indefinitely, until this technology becomes widely available in land mobile radio communications systems; and

BE IT FURTHER RESOLVED that the Board of Delegates urges that frequencies created by re-farming the existing spectrum now assigned to public safety users be retained by those public safety users, and not permitted to be used by non-emergency services agencies.

ADOPTED THIS 26th DAY OF July, 1993:



C. David Ward, Chairman



E. Lee Armour, Executive Director